

ORIGINAL

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

RECEIVED

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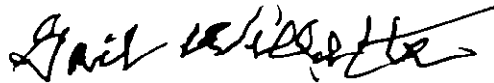
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORY TO UNITED STATES POSTAL SERVICE  
(OCA/USPS-88)  
(October 16, 1996)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits an interrogatory and request for production of documents. Instructions included with OCA Interrogatories 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

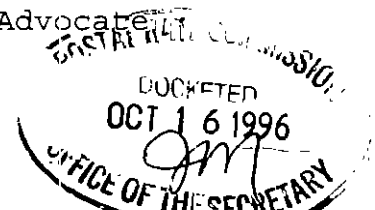
Respectfully submitted,



GAIL WILLETTE  
Director  
Office of the Consumer Advocate



EMMETT RAND COSTICH  
Assistant Director  
Office of the Consumer Advocate



OCA/USPS-88. Please refer to the attached exhibits, OCA Exhibits 1 and 2, and to the September 25 comments of NAPUS. In order to assist the OCA (and the Commission) in evaluating the NAPUS comments on proposed fees at non-city delivery (Group II) offices, please answer the following questions.

OCA Exhibits 1 and 2 are tabulations of post office box data from LR-SSR-113 at the CAG/delivery group level. OCA Exhibit 1 summarizes the installed box data and Exhibit 2 summarizes the rented box data.

Exhibits 1 and 2 demonstrate that each delivery group, other than Group IA, contains many different CAG level post offices. A comparison across delivery groups also reveals that the same CAG level post offices can occur in several delivery groups. This raises questions about the costs associated with post offices by CAG as opposed to costs by delivery group.

- a. Please confirm that the number of post office boxes installed, for each box size, by CAG in each delivery group is the number shown in OCA Exhibit 1. If you do not confirm, please provide corrections.
- b. Please confirm that the number of boxes in use, for each box size, by CAG in each delivery group is the number shown in

OCA Exhibit 2. If you do not confirm, please provide corrections.

- c. Please confirm that the rental cost in dollars per square foot for each delivery group represents an average of the rental cost per square foot of the CAGs in that delivery group. If you do not confirm, please explain.
- d. Please confirm that each delivery group (except Group III) has CAG A facilities. If you do not confirm, please explain.
- e. Please confirm that over 140,000 Group II boxes are installed at CAG A-D facilities. If you do not confirm, please provide corrections.
- f. Please confirm that over 200,000 Group IC boxes are installed at CAG H-J facilities. If you do not confirm, please provide corrections.
- g. Have any studies been conducted that demonstrate that CAG A offices in Group IC have higher rental costs per square foot than CAG A offices in Group II? If yes, please provide all such studies, reports, data, and other information.
- h. Have any studies been conducted to determine which of these two, CAG size or delivery group, drive rental costs per

square foot? If yes, please provide all such studies, reports, data and other information.

- i. Please provide the average rental cost per square foot by CAG by delivery group. If you are unable to provide this information, please provide the SAS data set FMSRTE of LR-SSR-99, page 30, line 57.
- j. Please provide the average rental cost per square foot by CAG by box size. If you are unable to provide this information, please provide the SAS data set FMSRTE of LR-SSR-99, page 30, line 57.
- k. Please provide post office box attributable costs by CAG.
- l. Please provide post office box attributable costs by CAG by box size.
- m. Please confirm that there is an inverse relationship between unit attributable post office box costs and CAG. If you do not confirm, please explain.
- n. Please confirm that a station or branch of a CAG A office is unlikely to be found in a rural area. If you do not confirm, please explain.
- o. Please confirm that a CAG J office is unlikely to be found in an urban area. If you do not confirm, please explain.

Number Boxes Installed by Delivery Group and CAG 27  
 08:58 Wednesday, October 16, 1996  
 ----- DELGRP=1A -----

OBS	CAG	_FREQ_	BOXINST1	BOXINST2	BOXINST3	BOXINST4	BOXINST5	TOT_INST
1	A	29	35535	1987	1162	118	51	38853

----- DELGRP=1B -----

OBS	CAG	_FREQ_	BOXINST1	BOXINST2	BOXINST3	BOXINST4	BOXINST5	TOT_INST
2	A	51	28593	7312	2554	575	594	39628
3	B	42	18917	5639	1947	376	144	27023
4	C	9	7179	1893	982	111	1	10166
5	D	2	840	584	48	2	0	1474

Number Boxes Installed by Delivery Group and CAG 28  
 08:58 Wednesday, October 16, 1996

----- DELGRP=1C -----

OBS	CAG	_FREQ_	BOXINST1	BOXINST2	BOXINST3	BOXINST4	BOXINST5	TOT_INST
6	*	1	336	560	196	88	19	1199
7	A	996	560969	282671	111699	28081	8484	991904
8	B	648	403537	224054	83138	21782	5592	738103
9	C	1222	830992	429939	157166	42960	9708	1470765
10	D	631	453241	221187	76202	19391	3873	773894
11	E	1162	735772	362736	119972	28108	5341	1251929
12	F	1203	546355	245302	82219	16735	4949	895560
13	G	1209	403096	152510	52991	8307	1331	618235
14	H	496	123502	40862	15093	1838	662	181957
15	J	86	13201	4510	1734	139	269	19853
16	K	6	570	208	79	4	0	861

Number Boxes Installed by Delivery Group and CAG 29  
 08:58 Wednesday, October 16, 1996

----- DELGRP=2 -----

OBS	CAG	_FREQ_	BOXINST1	BOXINST2	BOXINST3	BOXINST4	BOXINST5	TOT_INST
17	*	5	1938	424	112	0	0	2474
18	A	29	13861	5380	2084	475	78	21878
19	B	23	12161	5165	1667	395	82	19470
20	C	48	26863	15244	5303	963	175	48548
21	D	40	26186	19240	5688	1215	169	52498
22	E	157	135187	67549	18996	3794	663	226189
23	F	381	283701	145878	37061	5309	717	472666
24	G	1199	729600	323310	86350	10085	4148	1153493
25	H	2514	1114493	456735	123255	10976	3353	1708812
26	J	4036	1130512	446504	117988	7778	1098	1703880
27	K	8187	1131879	454008	110900	4933	600	1702320
28	L	1179	77731	29287	9205	382	61	116666

NOTE: Missing values for CAG are denoted by "\*" in the above tables. The PO Box data file contained 6 records with missing CAG values.

## Number Boxes Rented by Delivery Group and CAG

30

08:58 Wednesday, October 16, 1996

----- DELGRP=1A -----

OBS	CAG	_FREQ_	BOXRENT1	BOXRENT2	BOXRENT3	BOXRENT4	BOXRENT5	TOT_RENT
1	A	29	26350	1644	922	96	28	29040

----- DELGRP=1B -----

OBS	CAG	_FREQ_	BOXRENT1	BOXRENT2	BOXRENT3	BOXRENT4	BOXRENT5	TOT_RENT
2	A	51	24515	5334	1973	316	562	32700
3	B	42	16040	3945	1319	246	116	21666
4	C	9	6008	1374	677	65	0	8124
5	D	2	756	312	38	0	0	1106

## Number Boxes Rented by Delivery Group and CAG

31

08:58 Wednesday, October 16, 1996

----- DELGRP=1C -----

OBS	CAG	_FREQ_	BOXRENT1	BOXRENT2	BOXRENT3	BOXRENT4	BOXRENT5	TOT_RENT
6	*	1	316	508	136	46	13	1019
7	A	996	475905	216578	73848	16626	5116	788073
8	B	648	345328	165610	56545	13695	3447	584625
9	C	1222	712854	326742	110936	27007	5863	1183402
10	D	631	376303	160932	53601	12220	2448	605504
11	E	1162	625163	270255	83862	17718	2882	999880
12	F	1203	458475	175663	56699	10056	1288	702181
13	G	1209	307894	96256	33296	4427	273	442146
14	H	496	82534	20947	7963	788	263	112495
15	J	86	7554	1641	678	48	124	10045
16	K	6	256	86	27	3	0	372

## Number Boxes Rented by Delivery Group and CAG

32

08:58 Wednesday, October 16, 1996

----- DELGRP=2 -----

OBS	CAG	_FREQ_	BOXRENT1	BOXRENT2	BOXRENT3	BOXRENT4	BOXRENT5	TOT_RENT
17	*	5	1429	348	102	0	0	1879
18	A	29	11900	4375	1587	274	33	18169
19	B	23	9973	4063	1300	231	35	15602
20	C	48	22674	12617	4422	716	127	40556
21	D	40	24115	18006	5058	1095	132	48406
22	E	157	116340	55025	15179	2890	461	189895
23	F	381	245461	120028	31422	4245	493	401649
24	G	1199	629915	271509	73143	7611	678	982856
25	H	2514	948789	369732	98272	8162	946	1425901
26	J	4036	930397	345572	89703	5086	490	1371248
27	K	8187	843609	319615	74001	2749	299	1240273
28	L	1179	41383	15851	3765	119	6	61124

NOTE: Missing values for CAG are denoted by "\*" in the above tables. The PO Box data file contained 6 records with missing CAG values.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.

A handwritten signature in black ink, reading "Emmett Rand Costich". The signature is written in a cursive style with a large initial 'E'.

EMMETT RAND COSTICH  
Attorney

Washington, D.C. 20268-0002  
October 16, 1996